

reserved herein, hereby removes this case from the Court of Common Pleas, Philadelphia County, to the United States District Court for the Eastern District of Pennsylvania. This Court has jurisdiction over all the claims that Plaintiff attempts to bring pursuant to 28 U.S.C. § 1332.

In support of its Notice of Removal, Defendant Flaster states as follows:

1. Plaintiff Taffie Jones commenced this action on April 30, 2013 in the Court of Common Pleas, Philadelphia County (April Term 2013, Case No. 00447). A true and correct copy of the Complaint and all documents that were served on Defendant Flaster as of the date of this filing are attached hereto as Exhibit A.

2. Defendant Flaster was served with the documents attached hereto at Exhibit A on April 30, 2013. As of the date of this filing, there have been no other pleadings filed according to the docket for the Court of Common Pleas, available online, and Defendant Flaster is aware of no other filings in this matter.

3. This Notice of Removal has been timely filed within the required 30 days of initial receipt of a copy of the Complaint. 28 U.S.C. § 1446(b).

4. This District embraces the Court of Common Pleas, Philadelphia County, where this suit was originally filed. Removal to this District is therefore proper. 28 U.S.C. §§ 118(a), 1441(a).

Diversity Jurisdiction

5. There is complete diversity of citizenship between Plaintiff Jones and Defendant Flaster, and the amount in controversy requirement is satisfied, as set forth more fully below. Accordingly, this Court has original jurisdiction over all of Plaintiff Jones's claims pursuant to 28 U.S.C. §1332(a)(1).

6. This Court's original jurisdiction, pursuant to 28 U.S.C. § 1332(a)(1), based on diversity of citizenship, is based on the following facts and allegations:

- a. Plaintiff Jones alleges that she is a citizen of Pennsylvania (Ex. A, Complaint, ¶ 1);
- b. Defendant Flaster is a citizen of New Jersey as it is a professional corporation that is incorporated in New Jersey and has its principal place of business in New Jersey; and
- c. the amount in controversy exceeds \$75,000, exclusive of interest and costs as Plaintiff seeks, among other things, “loss of income”; “consequential damages”; “interest”; “costs of suit”; “delay damages”; and other relief, (Ex. A, Complaint, Counts I, II and III). Further, each one of Plaintiff’s three Counts contain a demand for judgment “in excess of Fifty Thousand (\$50,000.00) Dollars”, such that Plaintiff’s total demand is over \$150,000. Also, Plaintiff’s initial demand to resolve this matter was over \$75,000.

7. In accordance with 28 U.S.C. § 1446(d), Defendant will promptly file a true and correct copy of this Notice of Removal with the Court of Common Pleas, Philadelphia County, and will promptly serve on counsel for Plaintiff a true and correct copy of this Notice of Removal.

WHEREFORE, Defendant Flaster/Greenberg P.C. respectfully requests that this Court remove and exercise jurisdiction over the civil action now pending between Taffie Jones and Flaster/Greenberg PC in the Court of Common Pleas, Philadelphia County, April Term 2013, Docket No. 004471, and requests that this action be placed on the docket of this Court for further proceedings as though it had originally been instituted in this Court.



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Attorneys for Defendant Flaster/Greenberg PC

Dated: May 20, 2013

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

TAFFIE JONES,

Plaintiff,

v.

FLASTER/GREENBERG P.C.,

Defendant.

CIVIL ACTION NO.

Court of Common Pleas

Philadelphia County

April Term 2013

Case No. 004471

CERTIFICATE OF SERVICE

I hereby certify that on the date set forth below, a true and correct copy of the foregoing
Notice of Removal, with attached Exhibit, was served via Electronic and First Class Mail upon:

The Pearce Law Firm
Edith A. Pearce, Esq.
Rebecca L. Thomas, Esq.
1429 Walnut Street, 14th Floor
Philadelphia, PA 19102
Attorney for Plaintiff Taffie Jones

A true and correct copy of the foregoing Notice of Removal, with attached Exhibit, was
also electronically filed with the following:

Philadelphia Court of Common Pleas
First Judicial District of Pennsylvania
Room 284, City Hall
Philadelphia, PA 19107



Aaron M. Moyer

May 20, 2013